May 2, 2022

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Thank you for this opportunity to provide comments on the 2022 Scoping Plan Update – Initial Air Quality & Health Impacts and Economic Analyses Results Workshop. **We support the swift implementation of Scenario 1 or 2 (carbon neutrality by 2035) due to their greater health and environmental justice (EJ) benefits, and better alignment with the IPCC Sixth Assessment Report on the need for rapid and deep greenhouse (GHG) emission reductions to lessen the risk of catastrophic climate tipping points.** These impacts include even more extreme drought and wildfires than California has already experienced, reduced agricultural productivity, sea level rise inundating our coastal cities, population displacement and economic devastation, and severe impacts on our cherished land and marine ecosystems. In light of the imperative to reduce climate pollutant emissions, we are very disappointed that CARB staff has not considered our previous comments specifically targeted at reducing short-lived climate pollutants (SLCP).

California has shown leadership as one of the few jurisdictions to set comprehensive reduction targets and strategies for SLCP. While California is working to reduce methane from all sectors to implement Senate Bill 1383 (Lara, 2016), CARB's GHG emission inventory shows no progress on methane reduction in any sector from 2007 through 2019, the latest year available. California has successfully slowed the rate of growth for hydrofluorocarbons (HFC) as they replace ozone-depleting substances (see CARB's HFC emission inventory), but is also not on track to meet the 2030 target. CARB's contractors for the Scoping Plan analyses are not expert in SLCP reduction strategies, and while CARB staff have this expertise, they are not putting out any proposals beyond the 2030 strategies.

The California Climate Reality Project (CRP) chapters, Clean Air Task Force (CATF), Environmental Investigation Agency (EIA), and Institute for Governance & Sustainable Development (IGSD) submitted detailed comments in July 2021 (attached) on the prior workshops on meeting carbon neutrality targets by 2045. In addition, the same groups sent similar comments in July 2021 on a draft CARB progress report on achieving a 40% reduction in dairy and livestock methane emissions by 2030. Our comments put an emphasis on SLCP reduction as they are our best chance at minimizing near-term climate tipping points, and are a complement to carbon dioxide reduction and removal. All methane, HFC, and black carbon emission sectors have a relatively small number of super-emitting sources – 1% to 10% – that are responsible for 40% to 60% of

the total emissions and an opportunity for meaningful reductions. While CARB has the data, tools, and expertise to identify these super-emitters, they are not a focus of current regulatory efforts or the Scoping Plan analyses, which is a major missed opportunity. Some specific opportunities for cost-effective reductions drawn from our prior comment letter are summarized below:

Methane

- Review and improve current methane emission inventories, the Mandatory GHG Reporting program, and enforcement activities to address the prevalence of abnormal emissions behavior. The California Methane Survey estimated emissions from 564 methane point sources (0.2% of 272,000 infrastructure elements surveyed) in California to be equivalent to 34% to 46% of the state's methane inventory for 2016. Successful mitigation focused on these super-emitters alone could achieve most, if not all, of the 2030 methane reduction target of 40%.
- Put into place a public data platform and start the regulatory process to use the anticipated 2023 launch of the first Carbon Mapper satellite for global methane super-emitter detection as an enforcement tool for leaks in landfill methane collection systems, dairy digesters, natural gas compression stations, and other oil and gas activities.
- In the same way that California bans electricity imports from coal combustion and other high-emission sources, consider natural gas procurement standards or other actions to incentivize or require producers to identify and fix upstream methane leaks, roughly equivalent to 20% of California's total GHG emissions.
- Revisit standards for separator and tank systems, lower the control threshold to one in line with Colorado, and remove the exemption for tanks with throughput below 50 barrels per day.
- Prohibit the use of venting pneumatic controllers at new and expanded sites and require operators to begin retrofitting existing sites to eliminate emissions from pneumatics as Colorado and New Mexico have done.
- Establish and help fund a public-industry partnership to identify and demonstrate methods to reduce methane from enteric fermentation that are verifiable and do not damage animal and public health or consumer acceptance.
- Draw from the leadership of the New Zealand Agricultural Greenhouse Gas Research Centre, the Department of Agriculture, Food and the Marine in Ireland and the ERA-GAS consortium in the EU, which are supporting development of novel farm-ready technologies to reduce methane emissions from dairy and livestock.
- Institute enforcement activities and other leak detection safeguards to determine whether diary digesters are capturing methane as intended (the California Methane Survey found four dairy digesters of 25 surveyed with high methane leaks of 50-500 kg per hour in 2016 and 2017).

- Address obvious shortcomings in the State's landfill methane mitigation enforcement program (the California Methane Survey described 30 landfills and two composting facilities as some of the largest outliers in the overall methane sources surveyed in 2016 to 2018, equivalent to 14% to 19% of the state's total methane inventory for 2016).

Hydrofluorocarbons

- Prevent intentional venting by increasing the ambition of the Refrigerant Recovery, Reclamation, and Reuse (R4) Program beyond the current temporary requirements.
- Align funding for HFC mitigation efforts (which have historically received less than 0.001% of the state's climate mitigation budget) with their climate impacts (5% using 100-year GWPs, nearly 10% using 20-year GWPs).
- Directing priority funding to smaller, independently-owned supermarkets/facilities in the most disproportionately burdened communities to achieve increased energy cost savings, improve grid reliability, improve air quality and public health, and provide much-needed cooling in the context of record-setting heatwaves and wildfires across the West.
- Add HCFC to the existing CFC (Ozone Depleting Substance) protocol as recommended by CARB's Compliance Offset Protocol Task Force.

Black Carbon

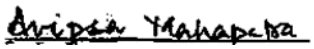
- Enhance existing enforcement programs to address the increasing relative contribution from high-emitters (3% of trucks cause half of all black carbon emissions).
- Strengthen regulations and emissions standards for biomass power plants exempt under Cap-and-Trade to improve air quality in EJ communities burdened by biogenic combustion.

We urge you to reconsider our July 2021 proposal and implement additional measures to reduce SLCP emissions.

Respectfully Submitted,

Janet Cox, Director of Legislation
350 Silicon Valley (5000 members)

Antonina Markoff, Coordinator, Climate Reality California State Coalition



Avipsa Mahapatra, Climate Campaign Lead
Christina Starr, Senior Policy Analyst, Climate Campaign
Alexander von Bismarck, Executive Director
Environmental Investigation Agency, US
P.O. Box 53343
Washington DC 20009

Todd Weber, Chair
Elders Climate Action, NorCal Chapter (900 members)

Richard Burke, Chair
Elders Climate Action, SoCal Chapter (200 members)

Durwood Zaelke, Founder and President
Jorge Daniel Taillant, Climate Justice Policy Advisor
Kristen Taddonio, Senior Climate and Energy Advisor
Institute for Governance & Sustainable Development
2300 Wisconsin Ave NW
Suite 300 B
Washington, DC 20007